



Public Service Commission of Wisconsin

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Public Service Commission of Wisconsin
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September 16, 2009

Mr. Bob Gile
P.O. Box 92
Gordon, WI 54838

Re: Investigation of Area Code Relief for the 715 Area Code in
Northern Wisconsin

5-TN-100

Dear Mr. Gile:

This is in response to your recent complaint regarding the Public Service Commission's (Commission) decision to implement an overlay area code for the 715 area code. I'll begin by providing you with some general background information regarding area code relief and then address the specific issues raised in your complaint.

The combined effects of new technologies, new telecommunications providers requiring their own telephone numbering inventories and the increased demand for telecommunications services in general have strained existing telephone number resources, both in Wisconsin and across the country. This rapid growth in demand for telephone numbers has resulted, in many places, a condition known as area code "exhaust." An area code reaches exhaust when all of the available central office codes within that area code have been assigned. In Wisconsin, both the 715 and 920 area codes are approaching exhaust. When this situation arises, area code relief, by means of an overlay or a geographic split, must then be implemented to ensure that an adequate supply of telephone numbers remains available for assignment.

An overlay occurs when more than one area code serves the same geographic area. Relief is provided by introducing a new area code within the same geographic region as the area code that is exhausting. With an overlay, all current customers are able to retain their existing area code and 7-digit telephone number. Eventually, in some locations, telephone numbers with the new area code will be assigned to new customers requesting service, as well as to existing customers ordering additional lines. Because both area codes will reside within the same geographic area, all local calls must be dialed using the area code and the 7-digit telephone number (10-digit dialing).

The second method of providing area code relief is a geographic split. With a split, the geographic area served by an existing area code is split into two smaller areas. One of the sections retains the existing area code while the other section receives a new area code. As a result, splits require an area code change for approximately one-half of the customers. Stationery, business cards, advertising and other written materials that include a telephone number need to be revised by those customers receiving the new area code. Additionally, affected customers need to inform friends, relatives, vendors and others that call them that their area code has changed.

Despite the efforts of Commission staff and Wisconsin's telecommunications industry to better conserve telephone numbers and extend the lives of the area codes, relief is still needed in the near future. The Commission considered the 715 and 920 area code relief dockets (5-TN-100 and 5-TN-106, respectively) in the fall of 2008 and directed relief to proceed. As the Commissioners noted in their deliberations, there is no option for area code relief that pleases everyone. Both methods of relief, either an overlay or a geographic split, have perceived "pros and cons." However, for the 715 and 920 area codes the Commission found that an overlay is the best alternative because it allows for the most efficient use of Wisconsin's new numbering resources, it minimizes many potential implementation problems and because it does not impose a financial burden on those customers forced to change their area code.

While the 715/534 overlay will be the first overlay implemented in Wisconsin, 67 overlays have been successfully implemented across the county since 1995. Over the years, overlays have increasingly become the preferred method of relief nationally. Of the relief efforts currently pending, 29 of 33 will be overlays. Although many customers who commented in these proceedings would have preferred a split in the 715 and 920 area codes, most were clear that they expected to be on the "winning" side of the split line and that they would be allowed keep their existing area code. That of course could not happen for everyone. With a split, approximately half of the customers are forced to change their area code and to bear the expense and inconvenience of changing their printed materials to reflect the new area code. On the other hand, many customers strongly believed that an overlay is the fairest approach to area code relief and that the inconvenience of 10-digit dialing is something that can be easily adapted to. Other states that have implemented overlays have reported that they are working well.

With regard to the specific issues raised in your complaint:

1. Why will it be necessary to dial the area code when making a local call? The Federal Communications Commission's rules (47 C.F.R. § 52.19(c)(3)(ii)) require 10-digit dialing whenever an overlay is implemented. This dialing requirement ensures accurate call routing¹ and it mitigates dialing disparities between those customers assigned telephone numbers in the old area code and those assigned numbers in the new area code. Additionally, the 10-digit dialing requirement also avoids disadvantaging newer providers (and their customers) and it promotes the goal of having a numbering system that is competitively neutral.
2. Will it be difficult for elderly residents to adapt to 10-digit dialing? The new dialing requirements will impact all residents living in northern Wisconsin, including elderly residents. Change can be difficult and the implementation of area code relief is no

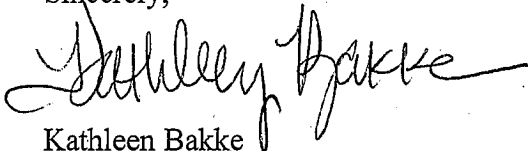
¹ Each area code has 792 assignable central office codes (the first the digits of your local telephone number). Eventually, the central office codes that currently serve the 715 area code will also be in service for the 534 area code. Since both area codes will serve the same geographic area, the area code is necessary to ensure that all calls will reach the correct destination.

exception. The Commission recognized that this would be a difficult transition for some residents so it ordered a 9-month "permissive dialing" period. During the permissive dialing period (which begins on October 17, 2009) customers are encouraged to begin using the area code and the 7-digit telephone number when making a local call. However, if the caller forgets and dials only the 7-digit telephone number, the call will still complete. The permissive dialing period allows customers time to transition to the new dialing pattern before it becomes mandatory on July 17, 2010. Reports from other states with overlays in effect indicate that this dialing requirement is not a significant problem.

3. Was public input solicited and considered during the Commission's investigation? Yes, there were nine public hearings throughout the 715 area code in September 2007. Unfortunately, we could not visit every community but we did try to cover a broad area with these events. The hearings were held in River Falls, Eau Claire, Wausau, Marinette, Rhinelander, Ashland, Hayward, Superior and Medford. Staff also gave numerous interviews to various media outlets while traveling in northern Wisconsin. Lastly, the Commission issued press releases and a Notice of Investigation seeking public comment. Staff received approximately 200 public comments in the 715 case, as well as letters from several legislators on behalf of their constituents.

Area code relief is a difficult issue on which it is impossible to get everyone to agree. Thank you for taking the time to share your opinion with the Commission. Your complaint has been recorded and will be available for review.

Sincerely,



Kathleen Bakke
Program and Policy Analyst
Telecommunications Division